

Mary Elizabeth Heard  
Texas State Bar No. 24096727  
Email: [meheard@heardlawfirm.net](mailto:meheard@heardlawfirm.net)  
M.E. Heard, Attorney, PLLC  
100 NE Loop 410, Suite 605  
San Antonio, Texas 78216  
Telephone: (210) 572-4925

*Counsel for Ovation Services LLC as  
agent for FGMS Holdings LLC*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

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<b>IN RE:</b>	<b>§ Chapter 13</b>
<b>JESUS PINEDA AND ERICA PINEDA</b>	<b>§ Case No. 20-30021-HCM</b>
<b>Debtors</b>	<b>§</b>
	<b>§</b>
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**NOTICE OF TERMINATION OF AUTOMATIC STAY**

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PLEASE TAKE NOTICE that Mary Elizabeth Heard of M.E. Heard, Attorney, PLLC files this Notice of Termination of Automatic Stay (the “Notice”) in the above-captioned case on behalf of Ovation Services LLC as agent for FGMS Holdings LLC (“Ovation”), secured creditor in the above-captioned case.

1. The Debtors’ (the “Debtor”) filed a voluntary petition under Chapter 13 of the Bankruptcy Code on January 7, 2020 (the “Chapter 13 Case”).
2. On October 6, 2021, an Agreed Order Agreed Order Resolving Ovation Services LLC as agent for FGMS Holdings LLC's Objection to Motion for Relief From

Automatic Stay Against Real Property [Docket No. 162] ("Agreed Order") was entered with the Court.

3. The Debtor has breached the terms of the Agreed Order in that Debtor has failed to pay the Chapter 13 Trustee and is delinquent \$16,422.28 through December, 2021. A Notice of Default letter was mailed to Debtor and Debtor's attorney on December 8, 2021 for which the default had not been cured within the 10-day deadline.
4. Pursuant the Agreed Order the stay is terminated for a period of one year from the date of entry of this Notice.
5. Ovation hereby provides notice that, pursuant to the terms of the Agreed Order, Ovation intends to exercise its full rights under state law and the loan documents, including, without limitation, to initiate foreclosure proceedings, without further notice to this Court.

Submitted on January 12, 2022.

Respectfully submitted,

**M. E. Heard, Attorney, PLLC**

/s/ Mary Elizabeth Heard  
MARY ELIZABETH HEARD  
Texas State Bar No. 24096727  
Email: meheard@heardlawfirm.net  
M. E. Heard, Attorney, PLLC  
100 NE Loop 410, Suite 605  
San Antonio, Texas 78216  
Telephone: (210) 572-4925

*Counsel for Ovation Services LLC as agent for  
FGMS Holdings LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing NOTICE was served on January 12, 2022 via the Court's electronic case filing (ECF) system on all parties receiving ECF notices in these cases and via first class U.S. mail to the parties listed below.

/s/ Mary Elizabeth Heard  
MARY ELIZABETH HEARD

Jesus Pineda  
12592 Arrow Weed Drive  
El Paso, TX 79928

Erica Pineda  
12592 Arrow Weed Drive  
El Paso, TX 79928

Michael R. Nevarez  
The Law Offices of Michael R. Nevarez  
P.O. Box 12247  
El Paso, TX 79913

Stuart C. Cox  
El Paso Chapter 13 Trustee  
1760 N. Lee Trevino Drive  
El Paso, TX 79936